

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California
public benefit corporation; LAURA
CHAMBERS and her marital community;
WINIFRED MITCHELL BAKER and her
marital community, and DANI CHEHAK and
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

[PROPOSED] ORDER GRANTING
PLAINTIFF'S SECOND MOTION TO
COMPEL

THIS MATTER came before the Court on Plaintiff's Second Motion to Compel. This Court has considered the records and files in this proceeding, including the following materials submitted by the parties:

1. Plaintiff's Second Motion to Compel Discovery Requests to Mozilla Corporation and Individual Defendants;
2. Declaration of Mathew Herrington In Support of Plaintiff's Motion to Compel, with exhibits;

[PROPOSED] ORDER GRANTING PLAINTIFF'S SECOND
MOTION TO COMPEL - 1
60606-003

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3. Defendants Mozilla Corporation a.k.a.M.F. Technologies, Laura Chambers, and Dani Chehak's Response in Opposition to Plaintiff's Second Motion to Compel Discovery Requests to Mozilla Corporation and Individual Defendants;

4. Reply to Plaintiff's Second Motion to Compel Discovery Requests to Mozilla Corporation and Individual Defendants;

5. Declaration of Maricarmen C. Perez-Vargas In Support of Reply to Plaintiff's Second Motion to Compel Discovery Requests to Mozilla Corporation and Individual Defendants, with exhibits.

The Court having reviewed the files and records herein, and being fully advised, **NOW THEREFORE,**

1. Mozilla Corporation is compelled to disclose information about other employees who separated from Mozilla Corporation after taking leaves of absence (like Plaintiff) (ROG 8) and/or after Requesting Disability Accommodation (like Plaintiff) (ROG 9), as this information is requested in Interrogatories 8-10 to Mozilla Corporation. Mozilla Corporation must produce this information within 14 days.

GRANTED _____ DENIED _____

2. Mozilla Corporation is compelled to disclose information about internal discrimination complaints for which Mozilla Corporation's process identified in response to Interrogatory No. 11 was not followed. This information is requested in Interrogatory No. 12. Mozilla Corporation must produce this information within 14 days.

GRANTED _____ DENIED _____

3. Mozilla Corporation is compelled to produce performance evaluations for Mitchell Baker and members of the Executive Steering Committee as requested in Request for

1 Production No. 11 to Mozilla Corporation. Mozilla Corporation must produce this information
2 within 14 days.

3 GRANTED _____ DENIED _____

4 4. Mozilla Corporation is compelled to produce information regarding complaints or
5 reports made to Mozilla Corporation's Human Resources department regarding mistreatment or
6 discrimination based on disability, in response to Request for Production No. 21. Mozilla
7 Corporation must produce this information within 14 days.

8 GRANTED _____ DENIED _____

9 5. Defendants Mozilla Corporation, Chambers, and Chehak are compelled to
10 disclose summaries, follow up, communications, and other requested information about the TK
11 Law assessment of Mozilla Corporation's cultural competence, i.e., its discriminatory practices,
12 as this information is requested in Requests for Production 26 and 27 to Mozilla Corporation and
13 Request for Production 2 to Chambers and Chehak. Mozilla Corporation, Chambers, and Chehak
14 must produce this information within 14 days.

15 GRANTED _____ DENIED _____

16
17 DATED _____, 2025

18
19 _____
20 THE HONORABLE RICHARD A. JONES

1 Presented by:

2 STOKES LAWRENCE, P.S.

3 By: /s/Maricarmen Perez-Vargas

4 Amy Alexander (WSBA #44242)

Mathew Harrington (WSBA #33276)

5 Maricarmen Perez-Vargas (WSBA # 54344)

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